UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:
AR-18J

Andrew Hall
Permit Review/Development Section
Division of Air Pollution Control
Ohio Environmental Protection Agency
122 South Front Street
Columbus, Ohio 43215

Dear Mr. Hall:

Please consider our following comments for the draft Title V renewal permit for West Lorain Plant (facility ID 0247080487, permit number P0105031), located in Lorain, Ohio.

1.   We would like clarification on whether the Compliance Assurance Monitoring (CAM) requirements of 40 C.F.R. Part 64 would apply to units P001-P005 for nitrous oxides (NOx). Currently, the permit does not contain CAM requirements. However, according to the facility's Prevention of Significant Deterioration permit (Permit to Install number 02-13376), the Best Available Control Technology for NOx includes use of dry low-nitrogen oxides burners when firing natural gas and water injection into the combustion zone when firing distillate oil. Please explain how these control technologies are not add-on control devices that would subject units P001-P005 to CAM or modify the permit to include the appropriate CAM requirements for these units.

2.   There are negative declarations made for New Source Performance Standards (NSPS) Subparts Dc and GG, but neither the permit nor the statement of basis provide the legal and factual bases (as required in 40 C.F.R. § 70.7(a)(1)(5)) for why these regulations do not apply. Furthermore, the permit does not clarify what the facility must do to avoid being subject to these regulations. Please modify the permit or statement of basis to include this information or revise the permit to incorporate NSPS Subparts Dc and GG as applicable requirements.

Thank you for considering these comments. Please feel free to reply via email to Kaushal Gupta, of my staff, or to call him at (312) 886-6803 if you have any questions about this letter.

Sincerely,

Genevieve Damico, Acting Chief
Air Permits Section